

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re: Colleen Beth Higgins) Case No.: 16-30731-KLP
)
 Debtor.) Chapter 13
)

REPLY TO MOTION TO DISMISS OR CONVERT CASE BY LAURIE PEARCE

Comes now your Debtor, by counsel, who hereby denies all of the allegations contained in Laurie Pearce's Motion to Dismiss Case. Your Debtor believes the purpose of this Motion, among other pleadings filed, is to harass and/or cause unnecessary delay in the conclusion of this case. Debtor further asserts that there is no need or reason to convert the case to one under Chapter 7 as the Plan payments have been completed and the case is ready for discharge.

WHEREFORE, your Debtor prays that the Motion be DENIED and prays for an award of attorneys fees and/or sanctions pursuant to the Federal Rules of Bankruptcy Procedure 9011.

/s/ Brett Alexander Zwerdling
Counsel

Certificate of Service

I hereby certify that on March 4, 2021 a true copy of this Response was served by CM/ECF or mailed to the following parties:

Office of the U.S. Trustee
701 E. Broad St, Room 4304
Richmond, VA 23219

Laurie Pearce
2311 Thousand Oaks Drive
Henrico, VA 23294

Suzanne E. Wade, 13 Trustee
P.O. Box 1780
Richmond, VA 23218

and also by email to Laurie Pearce at
lp23294us@yahoo.com

/s/ Brett Alexander Zwerdling

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